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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 25-00053 WHO
	)	
Plaintiff,	)	
	)	
v.	)	AMENDED STIPULATION RE INTERIM
	)	DISBURSEMENT OF FUNDS IN CLERK'S
NOAH ROSKIN-FRAZEE,	)	ACCOUNT AND [PROPOSED] ORDER
	)	
Defendant.	)	
	)	
	)	

The United States and defendant Noah Roskin-Frazee, by and through their respective counsel, hereby stipulate and agree as follows:

1. Pursuant to the plea agreement in the above-captioned matter and in the related case, No. 23-CR-00471 WHO, defendant Noah Roskin-Frazee agreed to deposit at least \$1 million in the registry of the Court within 60 days of the entry of his guilty pleas and at least another \$100,000 in the registry of the Court within 18 months of his guilty pleas. *See* Plea Agmt. ¶ 9. This money was to be deposited for the benefit of the defendant's restitution obligations. *Id.*
2. The defendant has since deposited over \$1,128,925.86 into the registry of the Court. *See* ECF Nos. 13, 19.

3. The Court has not yet made a final determination of the total restitution owed by the defendant, but the parties have agreed that it totals at least \$3,945,096.32. *See* Plea Agmt. ¶ 9.
4. The defendant is enrolled in one of the Court’s alternative justice programs; if the defendant successfully completes that program, the Court will likely not impose judgment for more than a year.
5. In light of this extended delay in the proceedings, the parties determined that it is appropriate for the Clerk to make an interim distribution of the funds in the Clerk’s registry to the victims and have agreed that the defendant should receive credit in this amount towards any restitution the Court eventually orders.
6. On October 17, 2024, prior to the guilty plea and sentencing in this case, the Court directed the Clerk to accept payment for the defendant’s criminal monetary penalties and “maintain such funds in the Clerk’s Registry, including interest earned thereon, pending any further order of the Court.” ECF No. 27.
7. On June 18, 2025, the Parties stipulated and requested that that the Court enter an order disbursing funds directing the Clerk to disburse the funds it maintains under the above-captioned case. The Court entered that order on June 20, 2025.
8. On July 18, 2025, the Parties filed an amended stipulation to accommodate revisions requested by the Clerk of the Court. That same day, the United States also filed a sealed notice identifying the victims named in the relevant indictment. The Court entered its order on the stipulation on July 23, 2025. Thereafter, the Clerk of Court requested that the order also include a specific reference to the sealed notice.

WHEREFORE, to provide additional clarity that the order entered on July 23, 2025, encompasses the victims identified in the sealed notice, the parties respectfully request that the Court enter an order, in the form proposed below, directing the Clerk of Court to disburse the funds held in the above-captioned case to the victims identified in the sealed notice entered in this case as ECF No. 24.

IT IS SO STIPULATED this 29th day of July, 2025.

1 CRAIG H. MISSAKIAN  
2 United States Attorney

3 /s/ Nikhil Bhagat

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NIKHIL BHAGAT  
Assistant U.S. Attorney

CONRAD METLITZKY KANE LLP

/s/ Elizabeth Ann Kim

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ELIZABETH ANN KIM  
6 Counsel for Noah Roskin-Frazee  
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**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, and for good cause shown,

IT IS HEREBY ORDERED that the Clerk of Court release all funds held in the Court Registry under case number 3:25-CR-00053 WHO, including both principal and any accrued interest;

IT IS FURTHER ORDERED that the Clerk of Court disburse **97 percent** of those funds to the victim identified as COMPANY B in **(Sealed) Docket Entry No. 24** in this case;

IT IS FURTHER ORDERED that the Clerk of Court disburse **three percent** of those funds to the victim identified as COMPANY A in **(Sealed) Docket Entry No. 24** in this case;.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. WILLIAM H. ORRICK  
Senior United States District Judge